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cc: (b) (6) Riverkeeper & Executive Director
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(b) (6) Portland Harbor Community Advisory Group
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From: (b) (6), interested Portland resident

RE: Comments to EPA regarding Portland Harbor Superfund Site Cleanup Plan
Aug 25, 2016

Preamble: I am offering these comments based on my experience of writing Water Quality Certifications for Massachusetts for dredging and filling proposals over 16 years ago. I find EPA's "Common Elements of All Alternatives" section of the proposed clean-up plan contains worthwhile protections for aquatic life. I hope they will be requirements for contractors, not just options. Still, the project with its huge area including navigation channels and varying high contamination problems along its industrial banks makes for difficult decisions about clean-up. I applaud you for the work that has gone into the proposed plan.

1. Alternative E includes dredging about 40 more acres in SDU 6 Nav than the proposed Alternative I. I would prefer EPA's final plan should include this additional 40 acres of dredging. Removing this material would result in the Hazard Index for the area due to PAHs being lowered to 3, rather than at 5 in the proposed plan alternative I.
2. EPA's final plan should cap Willamette Cove (SDU 6.5 E) as in Alternative E, so that this shore area would be permanently more fit for people and wildlife.
3. As specified in "Common Elements of All Alternatives" it will be important for the remedial design plan to require dredging by environmental/closed buckets to minimize release of contaminants to the water column (Plan, p. 28).
4. Likewise, depending on contaminant concentrations and mobility, EPA's final plan should specify which near-shore areas should be dredged within sheetpile (or other effective) enclosures so that resuspended contaminants are not dispersed to surrounding river areas.
5. The estimated construction period for Alternative I is 7 years, working only 4 months each summer. This seems reasonable. I understand that Alternative I, once completed, will require 20 to 30 more years before the fish consumption reaches the safety desired because of the need to use natural sediment deposition (MNR) in large areas. This seems way too long to wait. I believe EPA's remedial plan should ensure that within ten (10) years following construction the Preliminary Remediation Goals for Consumption of Prey (RA06) for wildlife and Consumption of Fish and Shellfish by people (RA02) are substantially met.
6. If the construction time frame to achieve the goals mentioned above in #5 is longer than 7 years, then could EPA contract for two (or more?) dredging/work crews to be operating simultaneously in different parts of the river? Would treating a greater area with Enhanced Natural Recovery help meet the endpoints sooner for RA06 and RA02?

7. Re: groundwater plumes (Harbor Clean-up Plan, p 59) and benthic habitat: The final EPA Plan should make benthic risk reduction a higher priority. The present plan seems to place a higher priority on reducing construction impacts to benthic areas. Since only pollution tolerant species are generally found now in benthic areas, I request that more construction be done initially so that following completion of the clean up, the river has a better chance for healthy benthic recolonization by clams, crayfish, etc.

8. Re: Swan Island Lagoon (p 60): Similar to comment #7 above, I would urge that EPA's final plan include disrupting more benthic area and remove more than 50% of the risk from PCBs and B--phthalate.

9. Re: use of a Terminal 4 CDF: I am opposed to use of a near-shore area to sequester contaminants from the river. It would be better to dispose of them farther away to eliminate possible re-contamination of the river following a subduction zone earthquake.